

1 Barraza Law, PLLC
10728 16th Ave SW
2 Burien, WA 98146
206-933-7861 phone
3 206-933-7863 fax

The Honorable Timothy W. Dore
Chapter 13
Hearing Date: July 26, 2019
Time: 9:30 AM
Response Due: July 19, 2019
Location: U.S. Bankruptcy Court
700 Stewart Street # 8106
Seattle, WA 98101

6 UNITED STATES BANKRUPTCY COURT
7 WESTERN DISTRICT OF WASHINGTON AT SEATTLE

8 In Re:

9 LISA KARIN PERSSON,
10
11 Debtor.

Case No. 16-10257

Chapter: 13

MOTION FOR APPROVAL OF AMENDED
CHAPTER 13 PLAN

12
13 COME NOW, the Debtor, by and through their attorney, John R. Laris, and move the court for
14 an order approving their Amended Chapter 13 Plan, filed on June 27, 2019 (ECF No. 66).

15 1. On January 21, 2016, (the "Petition Date"), the debtor filed a voluntary petition for relief
16 under chapter 13 of title 11 of the United States Code, 11 U.S.C. §§ 101-1330, as amended.

17 2. Debtor filed her initial Chapter 13 Plan on February 4, 2016.

18 3. Debtor filed an Amended Plan on April 20, 2016 under ECF no. 35 and then a second
19 Amended Plan on August 19, 2016 under ECF no. 51.

20 4. The Debtor's Chapter 13 Plan was confirmed on September 30, 2016 under ECF No. 57.

21 5. Debtor submitted an amended plan on June 26, 2019 (ECF No. 66) because her residence
22 is in foreclosure and she cannot stop the foreclosure and the majority of her plan payments are
23 dedicated to paying the mortgage and arrears.

24 6. Debtor respectfully requests the Court approve her amended plan filed on June 27, 2019
25 (ECF No. 66) to change the plan payment period to thirty-six months so her discharge can be granted
26 now.

27 Signed on June 27, 2019 at Burien, Washington and respectfully submitted.

By: /s/ John R. Laris

John R. Laris, WSBA # 44406
Attorney for the Debtor

MOTION FOR APPROVAL OF AMENDED
CHAPTER 13 PLAN - P A G E | 1

Barraza Law, PLLC
10728 16th Ave SW
Burien, WA 98166
206-933-7861 phone
206-933-7863 fax